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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LINDA COX,

**Plaintiff,**

vs.

RICHLAND HOLDINGS, INC. d/b/a  
ACCOUNT CORP OF SOUTHERN  
NEVADA, a Nevada Corporation; PARKER  
& EDWARDS, INC., a Nevada Corporation;  
and THE LANGSDALE LAW FIRM, P.C., a  
Nevada professional corporation,

### Defendants.

Case Number: 2:16-cv-02914-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
DEADLINE**

**(FIRST REQUEST)**

Plaintiff Linda Cox (“Plaintiff”) and Defendants Richland Holdings, Inc. d/b/a AcctCorp of Southern Nevada (“AcctCorp”), Parker & Edwards, Inc., and The Langsdale Law Firm, P.C. (together, the “Parties”), by and through their respective counsel of record, hereby stipulate and jointly move the Court, pursuant to LR 26-4, for an Order Extending the Dispositive Motion Deadline an additional thirty (30) days. The current deadline of December 7, 2017 for dispositive motions would be extended to **January 5, 2018**.

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1       1. The deposition of Harry Jacobs, Principal of Safeguard Credit, LLC d/b/a  
2 Credit Restoration of Nevada, is scheduled for December 7, 2017, to be conducted at the  
3 Federal Courthouse. *See ECF No. 61.*

4       2. On November 15, 2017, this Court entered an Order on the Parties'  
5 stipulation for Experian Information Solutions, Inc. to produce documents in response to  
6 AcctCorp's subpoena, production of which AcctCorp is currently awaiting. *See ECF No. 64.*

7       3. Accordingly, because these two outstanding issues may affect the content of  
8 dispositive motions, the Parties submit that good cause exists to extend the dispositive  
9 motion deadline from December 7, 2017, to **January 5, 2018.**

10      **IT IS SO STIPULATED.**

11      Dated this 20th day of November, 2017.

12      LAW OFFICE OF VERNON NELSON  
13      /s/ Margaret G. Foley  
14      VERNON A. NELSON, JR., ESQ.  
15      Nevada Bar No. 6434  
16      MARGARET G. FOLEY, ESQ.  
17      Nevada Bar No. 7703  
18      JOHN P. SKALAK, ESQ.  
19      Nevada Bar No. 4385  
20      ANDREW WASIELEWSKI, ESQ.  
21      Nevada Bar No. 6161  
22      MELISSA INGLEBY, ESQ.  
23      Nevada Bar No. 12935  
24      9480 S. Eastern Avenue, Suite 252  
25      Las Vegas, Nevada 89123  
26      *Attorneys for Plaintiff Linda Cox*

11      Dated this 20th day of November, 2017.

12      MARQUIS AURBACH COFFING  
13      /s/ Jared M. Moser  
14      TERRY A. COFFING, ESQ.  
15      Nevada Bar No. 4949  
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22      *Attorneys for Defendants Richland Holdings,  
23      Inc. and Parker & Edwards, Inc.*

24      Dated this 20th day of November, 2017.

25      ROPERS, MAJESKI, KOHN & BENTLEY  
26      /s/ Timothy J. Lepore  
27      STEPHEN J. ERIGERO, ESQ.  
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35      *Attorneys for Defendant Langsdale Law  
36      Firm, P.C.*

1                   *Cox vs. Richland Holdings, Inc. et al.*, Case No. 2:16-cv-02914-APG-VCF  
2                   Stipulation and Order to Extend Dispositive Motion Deadline (First Request)

3                   **IT IS SO ORDERED:**

4                   **DATED:** November 20, 2017.  
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**CAM FERENBACH**  
9                   UNITED STATES MAGISTRATE JUDGE  
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